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August 30, 2021

**VIA ECF**

The Honorable Ronnie Abrams  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: ***Erdman v. CarLotz, Inc., et al., No. 1:21-cv-05906-RA;***  
***Widuck v. CarLotz, Inc., et al., No. 1:21-cv-06191-RA;***  
***Turk v. CarLotz, Inc., et al., No. 1:21-cv-06627-RA***

Dear Judge Abrams:

With the permission of all counsel in the above matters, I write on behalf of all parties in response to the Court's August 16, 2021 Order directing that, no later than August 30, 2021, the parties meet and confer and inform the Court by joint submission whether (1) any party anticipates moving to consolidate these actions; and (2) if so, propose a common schedule by which the motions for consolidation and the selection of lead plaintiff/counsel will be submitted. (*Erdman* ECF No. 12.)

The parties have met and conferred and agree that the above matters should be consolidated for all purposes, including pre-trial proceedings and any trial, pursuant to Federal Rule of Civil Procedure 42(a) and that it would be more efficient to postpone the initial case management conference, including the submission of a draft case management plan and joint letter (*Erdman* ECF No. 5), until after lead plaintiff(s) and lead counsel are appointed by the Court. A copy of the parties' stipulation is enclosed for the Court's consideration.

We look forward to addressing the applications for lead plaintiff(s) and lead counsel at the telephonic motions hearing set for October 15, 2021 at 10:00 a.m., as well as any other issues Your Honor may wish to address.

Respectfully submitted,

/s/ Gregory B. Linkh  
Gregory B. Linkh